

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

PAMELA COLLINS,)	
)	
Plaintiff/Counter Defendant,)	
)	
vs.)	Civil Action No. 3:10-cv-451
)	Phillips/Shirley
PROGRESSIVE DIRECT)	
INSURANCE COMPANY,)	
)	
Defendant/Counter Plaintiff.)	

MOTION FOR DEFAULT JUDGMENT

Comes the Counter Plaintiff, by and through counsel, pursuant to Rule 55 of the Federal Rules of Civil Procedure and moves this Honorable Court for entry of a default judgment. In support of the Counter Plaintiff's motion, the Counter Plaintiff would state that the Counter Complaint filed against the Counter Defendant was filed with this Court on October 28, 2010. The Counter Defendant has failed or has otherwise refused to file a responsive pleading to the Counter Complaint within the time prescribed by the Federal Rules of Civil Procedure.

WHEREFORE, the Counter Plaintiff moves this Honorable Court for entry of a default judgment accordingly.

Respectfully submitted,

TRAMMELL, ADKINS & WARD, P.C.

By s/Terrill L. Adkins
Terrill L. Adkins, BPR #013138
Attorney for Counter Plaintiff
P.O. Box 51450
Knoxville, Tennessee 37950
865/330-2577

CERTIFICATE OF SERVICE

I hereby certify that on **12-23-2010**, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

TRAMMELL, ADKINS & WARD, P.C.

By s/Terrill L. Adkins
Terrill L. Adkins